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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DESIREE NELSON,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:16-cv-02402-JCM-CWH

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Opposition to Plaintiff's Motion for Remand, due on November 13, 2017, by 30 days, through and including December 13, 2017.

An extension of time is needed in order to prepare Defendant's Opposition because the undersigned counsel is involved in preparations for two evidentiary hearings in labor and employment litigation matters, and requires additional time to adequately research and prepare the issues presented by Plaintiff in motion to remand. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
2 on November 7, 2017.

3 Respectfully submitted this 7th day of November 2017.

4 STEVEN W. MYHRE
5 Acting United States Attorney

6 /s/ Cynthia B. De Nardi
7 CYNTHIA B. DE NARDI
8 Special Assistant United States Attorney

9 OF COUNSEL:

10 DEBORAH LEE STACHEL
11 Regional Chief Counsel, Region IX

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13 IT IS SO ORDERED:

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16 UNITED STATES MAGISTRATE JUDGE

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DATED: November 8, 2017

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CERTIFICATE OF SERVICE

I, Cynthia B. De Nardi, certify that the following individual was served with a copy of the
UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service
identified below:

CM/ECF:

Mark D. Barrett
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Dated this 7th day of November 2017.

/s/ Cynthia B. De Nardi
CYNTHIA B. DE NARDI
Special Assistant United States Attorney